

BRAUNHAGEY & BORDEN LLP

San Francisco & New York

J. Noah Hagey, Esq.
Managing Partner
hagey@braunhagey.com

November 14, 2016

VIA ECF

Honorable Vincent L. Briccetti
United States District Court Judge
U.S. Courthouse – Southern District of New York
300 Quarropas Street, Room 630
White Plains, NY 10601

**Re: Stipulation for Extension of Time / Letter Motion Pursuant to Local Rule F,
Mayhew, et al. v. KAS Direct, LLC, Case No. 7:16-cv-06981-VB (SDNY)**

Dear Judge Briccetti:

Our firm represents Defendant KAS Direct, LLC (“KAS”) in the above-captioned matter.

Consistent with Your Honor’s independent rules, we write to respectfully request entry of the enclosed Stipulation and [Proposed] Order extending KAS’s time to respond to the Complaint from November 14, 2016 up through and including December 29, 2016. The parties seek such an extension as they are currently discussing issues relating to the case, which need to be resolved prior to the filing of an answer or responsive pleading. The parties will promptly communicate with the Court should further extension or assistance from the Court on the issue be necessary.

No prior requests for extension or continuance have been made in this matter. Plaintiffs’ counsel have reviewed this request and consent to the filing. We appreciate the Court’s consideration of the request.

Respectfully submitted,



J. Noah Hagey

Cc: Counsel of Record via ECF

San Francisco
220 Sansome Street, 2nd Floor
San Francisco, CA 94104
Tel. & Fax: (415) 599-0210

New York
80 Broad Street, Suite 1302
New York, NY 10004
Tel. & Fax: (646) 829-9403